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12 Co-Lead Counsel for Plaintiffs

13 [Additional counsel appear on signature page.]

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA

16 In re OPENWAVE SYSTEMS, INC.)
SHAREHOLDER DERIVATIVE)
17 LITIGATION)

Master File No. C-06-03468-SI

STIPULATION TO EXTEND TIME

18 _____)
This Document Relates To:)

19 ALL ACTIONS.)
20 _____)

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1 WHEREAS, on October 12, 2006, this Court entered an Order consolidating four related
2 shareholder derivative actions on behalf of nominal defendant Openwave Systems, Inc.
3 (“Openwave”);

4 WHEREAS, pursuant to this Court’s November 6, 2006 Minute Entry (Docket #52) (the
5 “November 6 Order”), the consolidated complaint is due on December 22, 2006;

6 WHEREAS, the November 6 Order sets forth a schedule for defendants’ response to the
7 consolidated complaint as follows:

- 8 1. Defendants’ motion to dismiss is due January 26, 2007;
- 9 2. Plaintiffs’ opposition is due February 23, 2007; and
- 10 3. Defendants’ reply is due March 9, 2007.

11 WHEREAS, on December 1, 2006 Openwave filed a Form 10-K with the Securities and
12 Exchange Commission detailing the results of its investigation into Openwave’s stock option
13 granting practices and restating Openwave’s historical financial results;

14 WHEREAS, the Form 10-K is over 100 pages long and contains detailed information related
15 to plaintiffs’ allegations;

16 WHEREAS, after meeting and conferring the parties agree that the briefing schedule should
17 be modified.

18 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the parties,
19 through their respective counsel of record, as follows:

- 20 1. The consolidated complaint shall be filed by December 29, 2006;
- 21 2. Defendants’ motion to dismiss shall be filed by February 2, 2007;
- 22 3. Plaintiffs’ opposition to defendants’ motion to dismiss shall be filed by March 2,
23 2007; and
- 24 4. Defendants’ reply shall be filed by March 16, 2007.

25 IT IS SO STIPULATED.

1 DATED: December 21, 2006

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26 *I, Benny C. Goodman III, am the ECF User whose ID and password are being used to file*
27 *this Stipulation to Extend Time and [Proposed] Order. In compliance with General Order 45, X.B.,*
I hereby attest that Garrett J. Waltzer has concurred in this filing.

1 DATED: December 21, 2006

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13 DATED: December 21, 2006

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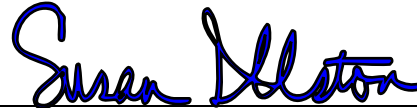
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Michael C. Mulica, Joshua A. Pace, Steven
Peters, David Peterschmidt, Allen E. Snyder and
Simon Wilkinson

* * *

ORDER

IT IS SO ORDERED.

DATED: _____



THE HONORABLE SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Benny C. Goodman III
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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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